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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE DANA M. SABRAW)

UNITED STATES OF AMERICA,)	Criminal No. 07CR3406-DMS
)	
Plaintiff,)	Date: January 25, 2008
)	Time: 11:00 a.m.
v.)	
)	NOTICE OF MOTIONS AND
PETER MICHAEL MARTIN,)	MOTIONS TO:
)	1) COMPEL DISCOVERY AND PRESERVE
)	EVIDENCE;
)	2) SUPPRESS STATEMENTS;
Defendant.)	3) DISMISS INDICTMENT DUE TO
)	MISINSTRUCTION OF GRAND JURY; AND
)	4) GRANT LEAVE TO FILE FURTHER MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on January 25, 2008, or as soon thereafter as counsel may be heard, the accused, Peter Michael Martin, by and through his attorneys, Amber Baylor, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed below.

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MOTIONS

Peter Martin, the accused in this case, by and through his attorneys, Amber Baylor, and Federal Defenders of San Diego, Inc., pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Federal Rules of Criminal Procedure and all other applicable statutes, case law and local rules, hereby moves this court for an order:

- 1) to compel further discovery and preserve evidence;
- 2) to suppress statements;
- 3) dismiss indictment due to misinstruction of grand jury; and
- 4) to grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: January 11, 2008

/s/ Amber Baylor
AMBER BAYLOR
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Martin